

I support the implementation of Reduced Vertical Separation Minimum (RVSM); however, I wonder why does the FAA assume that maintenance and maintenance training cost are not significant...when actually a large part of the airworthiness process is maintenance. Some consideration should be given to the possibility that although there might be a decrease in the delay and capacity between FL290 to FL410, there may also be an increase of traffic in the underlying airspace caused by a large number of aircraft unable to meet the requirements of RVSM. These non RVSM certified aircraft would then contribute to a new airspace utilization safety issue and their fuel consumption at lower altitudes would also be counter productive.